

REMARKS

Applicant appreciates the detailed examination evidenced by the Office Action mailed May 4, 2009 (hereinafter "Office Action"). Applicant respectfully submits that the pending claims are in condition for allowance for at least the reasons discussed herein.

The Section 103 Rejections

A. Claims 1, 3, 5, 9, 11, 16-17, 19, 21 and 25-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over United States Patent Publication No. 2003/0140238 to Turkboylari (hereinafter "Turkboylari") in view of United States Patent No. 5,973,968 to Schu et al. (hereinafter "Schu"). *See* Office Action, page 2. Applicant respectfully submits that many of the recitations of these claims are neither disclosed nor suggested by the cited combination. For example, independent Claim 1 recites:

A method of transferring data from a non-volatile memory to a working memory of an electronic data processing device, comprising:
 copying security data from the non-volatile memory to the working memory, wherein the security data is to be write-protected;
 activating a blocking function for the security data in the working memory, wherein activating is triggered by the copying being made to the working memory;
 monitoring all communication with the working memory; and
 blocking all write attempts to the copied security data stored in the working memory according to the blocking function, **wherein at least activating a blocking function, monitoring communication and blocking write attempts are performed independently of a central processing unit of the electronic data processing device, such that the central processing unit cannot manipulate the security data.**

Independent Claims 9 and 17 contain device and electronic data processing device recitations corresponding to the highlighted recitations of Claim 1. Applicant respectfully submits that at least the highlighted recitations of Claim 1 are neither disclosed nor suggested by the cited combination for at least the reasons discussed herein.

The Office Action admits that Turkboylari does not teach the highlighted recitation of Claim 1 set out above. *See* Office Action, page 3. However, the Office Action points to Schu as providing the missing teachings. *See* Office Action, page 4. Applicant respectfully disagrees. In particular, the Office Action states that "Write lock circuitry 208 is independent from processor 202." *See* Office Action, page 4. The cited portion of Schu states:

In response to write signal 210b, write lock logic is applied 230 by logic circuitry 208 in order to verify the appropriateness of providing write access to write lock RAM 206. If, after application of the write lock logic 230, write access to write lock RAM 206 is authorized 232, data is written 234 to the appropriate address locations in write lock RAM 206. If write lock logic circuitry 208 determines that write access to write lock RAM 206 is not authorized 232, write lock logic circuitry 208 prevents write signal 210b from effecting write access to write lock RAM 206. **A memory fault condition typically arises upon failure to authorize write access to write lock RAM 206 in response to an errant write signal 210b generated by processor 202 or other direct memory addressing component.** The fault condition is typically indicated in system memory by a latched fault bit or byte in a fault status register of processor 202.

Schu, column 9, line 55 to column 10, line 3. Thus, as discussed in the cited portion of Schu and illustrated in Figure 3 of Schu, Write Lock Logic Circuitry 208 operates responsive to an access signal 212 and a write signal 210b from the processor 202. Accordingly, it is clear that the device of Schu does not operate independently of the processor 202. In stark contrast, Claim 1 recites “wherein at least activating a blocking function, monitoring communication and blocking write attempts **are performed independently of a central processing unit of the electronic data processing device,** such that the central processing unit cannot manipulate the security data.” Accordingly, Applicant respectfully submits that independent Claim 1 and the claims that depend therefrom are patentable over the cited combination for at least these reasons.

As discussed above, independent Claims 9 and 17 contain similar recitations to the highlighted recitations of Claim 1. Accordingly, Applicants respectfully submit that independent Claims 9 and 17 and the claims that depend therefrom are patentable over the cited combination for at least the reasons discussed above with respect to Claim 1.

As each of the dependent claims depends from a base claim that is believed to be in condition for allowance, Applicant does not believe that it is necessary to argue the allowability of each dependent claim individually. Applicant does not necessarily concur with the interpretation of these claims, or with the bases for rejection set forth in the Office Action. Applicant therefore reserves the right to address the patentability of these claims individually as necessary in the future.

B. Claims 2, 4, 6, 10, 12-13, 18, 20 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Turkboylari in view of Schu, and in further view of U.S. Patent No. 5,586,291 to Laskar et al. (hereinafter "Laskar"). *See* Office Action, page 7. As each of the dependent claims depends from a base claim that is believed to be in condition for allowance, Applicant does not believe that it is necessary to argue the allowability of each dependent claim individually. Applicant does not necessarily concur with the interpretation of these claims, or with the bases for rejection set forth in the Office Action. Applicant therefore reserves the right to address the patentability of these claims individually as necessary in the future.

C. Claims 7, 14 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Turkboylari in view of Schu et al. and further in view of U.S. Patent Publication No. 2003/0226029 to Porter et al., (hereinafter "Porter"). As each of the dependent claims depends from a base claim that is believed to be in condition for allowance, Applicant does not believe that it is necessary to argue the allowability of each dependent claim individually. Applicant does not necessarily concur with the interpretation of these claims, or with the bases for rejection set forth in the Office Action. Applicant therefore reserves the right to address the patentability of these claims individually as necessary in the future.

3. Claims 8, 15, and 24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Turkboylari in view of Schu, and further in view of U.S. Patent No. 6,115,819 to Anderson (hereinafter "Anderson"). The Office Action admits that the recitations of Claims 8, 15 and 24 are not taught by the combination of Turkboylari and Schu. *See* Office Action, page 13. However, the Office Action points to Anderson as providing the missing teachings. *See* Office Action, page 13. Applicant respectfully disagrees. In particular, Claim 8 recites:

The method of Claim 1, further comprising disconnecting a debugging unit at least when copying the security data to the working memory and reconnecting the debugging unit when the blocking function has been activated.

Dependent Claims 15 and 24 contain similar recitations to Claim 8. The Office Action points

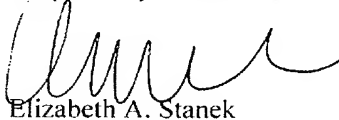
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to a portion of Anderson that discusses allowing or disallowing access using a control gate 44 and states that the "controlling gate 44 can be view as a debugging unit." *See* Office Action, page 13. The controlling gate 44 of Anderson is exactly that, a gate. *See e.g.*, Figure 1 of Anderson. Applicant fails to see how this gate teaches a debugging unit. Applicant admits that turning things on and off is known. However, Claim 8 recites disconnecting a debugging unit at least when copying the security data to the working memory and reconnecting the debugging unit when the blocking function has been activated. Nothing in Anderson discloses or suggests the recitations of Claim 8, 15 and 24 for at least these reasons. Accordingly, Applicant respectfully submits that Claims 8, 15 and 24 are separately patentable over the cited combination for at least these reasons.

CONCLUSION

As all of the claims are now in condition for allowance, Applicant respectfully requests allowance of the claims and passing of the application to issue in due course. Applicant urges the Examiner to contact Applicant's undersigned representative at (919) 854-1400 to resolve any remaining formal issues.

Respectfully submitted,

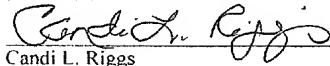


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CERTIFICATION OF TRANSMISSION

I hereby certify that this correspondence is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4) to the U.S. Patent and Trademark Office on August 4, 2009.


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